

**Plaintiff's
Exhibit "B"
13cv8281**

J. FLORES

1

2 correct?

3 A. Yes.

4 Q. And you can also make a
5 determination as to whether or not a person
6 is eligible to be arrested based on
7 probable cause, correct?

8 A. Yes.

9 Q. I'm sorry, your title now,
10 again, is?

11 A. Supervising investigator.

12 Q. And in your capacity as a
13 supervising investigator, you could also
14 direct one of your investigators to make an
15 arrest?

16 MS. KRASNOW: Form.

17 A. Yes.

18 Q. So let's go back to November
19 24, 2010.

20 Who called you?

21 A. Someone from the office, I
22 don't recall exactly who called me.

23 Q. And what, if anything, did they
24 tell you when they called?

25 A. They needed a supervisor to

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1
2 respond to that location.

3 Q. And what did you say to that?

4 A. I said okay.

5 Q. Did you ask them why you needed
6 to go over there?

7 A. They just said they needed an
8 extra supervisor and I went directly there.

9 Q. Did they tell you what the
10 subject of the event taking place that you
11 had to go to, did they tell you what was
12 going on, that person on the phone?

13 A. There was possibly going to be
14 a search warrant at this location and an
15 arrest had been made, so they needed an
16 extra supervisor.

17 Q. At the time you received that
18 phone call, were you informed which
19 investigators were on the scene?

20 A. No.

21 Q. So my understanding is the
22 person that spoke with you conveyed to you
23 that there was an arrest made and that
24 there was a pending search warrant that was
25 going to be executed, correct?

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2 going to do that?

3 A. No.

4 Q. Did you talk to him about her
5 possibly being a subject in your
6 investigation?

7 A. No.

8 Q. Outside of that statement by
9 the duty captain, was there any further
10 conversation between you and the duty
11 captain concerning Sergeant Diaz?

12 A. Not that I remember.

13 Q. Did there come a time you spoke
14 with Sergeant Diaz in her residence on
15 November 24, 2010?

16 A. Yes.

17 Q. What, if anything, was said?

18 A. I advised her that -- I
19 distinctly remember I advised her that I
20 didn't want to interview her, that I wanted
21 to talk to the delegate, the sergeant
22 delegate. And I also advised her that we
23 were waiting for a search warrant for her
24 place.

25 Q. What were you going to ask her?

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2 Q. So when you're approaching the
3 address that you were told to go to, you
4 see the officers in front on the steps you
5 mentioned.

6 Did you proceed inside?

7 A. Yes, sir.

8 Q. Prior to going inside, did you
9 address any one of those officers on the
10 way in?

11 A. I believe the duty captain was
12 by the front door and I am sure that I got
13 into a conversation with the duty captain.

14 Q. Prior to walking up those steps
15 and seeing those officers, did you see
16 anyone else outside that location?

17 A. I don't remember.

18 Q. Did you see any members from
19 DANY's investigation team?

20 A. They were somewhere, but I
21 don't remember exactly where they were.

22 Q. But my question is: Did you
23 see any of them?

24 A. At some point, yes.

25 Q. What was that, I'm sorry?